No. X06-UWY-CV15-6050025-S : SUPERIOR COURT

SUPERIOR COURT

DONNA L. SOTO, ADMINISTRATRIX OF : COMPLEX LITIGATION DOCKET THE ESTATE OF VICTORIA L. SOTO, ET AL. :

AT WATERBURY

V.

:

BUSHMASTER FIREARMS : JULY 27, 2021 INTERNATIONAL, LLC, ET AL.

## **DEFENDANTS' OFFER OF COMPROMISE**

Pursuant to Connecticut General Statutes § 52-193 and Connecticut Practice Book § 1711, Defendants Remington Arms Company, LLC and Remington Outdoor Company, Inc.¹
(collectively, "Remington") hereby make an Offer of Compromise to Plaintiffs, Leonard Pozner and Veronique De La Rosa, Co-Administrators of the Estate of Noah Samuel Pozner, in the captioned matter for the sum of THREE MILLION SIX HUNDRED AND SIXTY THOUSAND DOLLARS (\$3,660,000) to settle all claims inclusive of any fees and costs. Any ultimate settlement pursuant to this Offer of Compromise is subject to approval from the United States Bankruptcy Court for the Northern District of Alabama pursuant to Federal Rule of Bankruptcy Procedure § 9019 and the confirmation order in *In re Remington Outdoor Company, Inc., et al.* 

<sup>&</sup>lt;sup>1</sup> All of the other defendants named in the Plaintiffs Revised Second Amended Complaint, Bushmaster Firearms, Inc., Bushmaster Firearms International, LLC, Bushmaster Holdings, LLC, and Freedom Group, Inc., have been merged into Remington Arms Company, LLC and Remington Outdoor Company, Inc.

## DEFENDANTS REMINGTON ARMS COMPANY LLC AND REMINGTON OUTDOOR COMPANY, INC.

By: /s/ James H. Rotondo

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Their Attorneys

## **CERTIFICATION OF SERVICE**

This is to certify that a copy of the foregoing has been emailed this day to all counsel of record as follows:

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